

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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MEMORANDUM

DATE: August 2, 2016

SUBJ: Keddy Mill Superfund Site
Recommendation to Include PFAS in Remedial Investigation

FROM: Bob Cianciarulo, Chief
OSRR, Remediation & Restoration I Branch

TO: Christine Poore, OLEM

This memorandum contains EPA Region 1's recommendation regarding sampling for perfluoroalkyl substances (PFAS), specifically perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), during the ongoing Remedial Investigation work at the Keddy Mill Superfund Site in Windham, Maine. We are seeking consultation with EPA Headquarters and concurrence on our recommendation.

Background:

The Site housed many industrial activities 1756 and 1997, including a sawmill, grist and wool carding mill, wood pulp and boxboard manufacturing, steel manufacturing and fabrication of heavy equipment buckets, manufacturing of fire suppression piping and materials, a small machine shop and equipment storage. The Site has been vacant since 1997. The main contaminants of concern include PCBs and metals; PCB contamination is widespread throughout the Site and inside the abandoned mill building.

The Site is adjacent to a partially-developed commercial parcel and an occupied apartment complex, and the mill building is attached to a currently operating hydroelectric dam on the Presumpscot River.

The Site was listed on the NPL in May 2014. Remedial Investigation activities are currently ongoing, with monitoring well sampling occurring in the next two to three weeks. A water line serves the general area, however, a potable well survey is also in progress.

Possible Presence of PFAS:

Keddy Mill had a very large oil-based fire in late 1969 that heavily damaged the main mill building and destroyed several blast furnaces. While no one has any records dating back that far, because nine different communities responded to the 1969 fire, and due to several smaller fires within the mill building between 1969 and 1997, it is possible that fluorinated fire-suppressing foams may have been used.



Recommendation:

The Region recommends that it initially include PFAS analysis in its pending on-site monitoring well sampling, as well as in some on-site soil sampling since the Site is adjacent to a river and we expect groundwater discharge to the river should be quite fast.

Any further sampling of other media, including potable wells in the area (if any), will be conducted only if on-site monitoring wells or soil samples indicate PFAS at concentrations requiring such sampling. For screening purposes, PFOS and PFOA screening values for the groundwater and soil will be developed using the RSL calculator for a residential scenario and utilizing an HI = 0.1. This is consistent with standard practices for screening to identify contaminants of concern during a RI.

Please let us know if you concur with this recommendation. As monitoring well sampling is imminent, your prompt review would be appreciated.

Please contact me at 617-918-1330 or cianciarulo.bob@epa.gov with any questions.